

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

INTERNATIONAL FRESH PRODUCE
ASSOCIATION, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF LABOR, *et al.*,

Defendants.

Case No. 1:24-cv-00309-HSO-BWR

**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSE
TO PLAINTIFFS' MOTION FOR A SECTION 705 STAY OR PRELIMINARY
INJUNCTION**

Defendants, by and through their undersigned counsel, respectfully request a short, four-day extension to file a response to Plaintiffs' Motion for a Section 705 Stay or Preliminary Injunction, ECF No. 17. Plaintiffs filed the motion on October 17, 2024 and served it upon the United States Attorneys' Office on October 21, 2024. Defendants' default deadline to respond under the local rules is November 4, 2024. The Court has scheduled a hearing on the motion for November 18, 2024, at 1:30 p.m. Counsel for Defendants are currently responding to deadlines in several other cases challenging the same Final Rule at issue in this case, including an evidentiary hearing scheduled for November 4, 2024, in *Barton v. U.S. Department of Labor*, No. 5:24-cv-249-DCR (E.D. Ky.). Given this press of other business, Defendants request that the Court extend the deadline to file a response to Plaintiffs' motion to November 8, 2024. This short, four-day extension would still provide sufficient time for Plaintiffs to file a reply memorandum, and for this Court to hold its previously scheduled hearing on November 18, 2024. Counsel for

Defendants conferred with counsel for Plaintiffs, and Plaintiffs consent to the relief sought in this motion “on the condition that the [C]ourt is willing to accept [Plaintiffs’] reply on November 14.”

DATED: October 24, 2024

Respectfully submitted,

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JULIE STRAUS HARRIS
Assistant Branch Director

/s/ Michael P. Clendenen
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